

JUN 03 1998

Michael N. Milby, Clerk of Court

EDWARD ALCALA, et al.,

Plaintiffs,

VS.

**ALEX PEREZ, in his official capacity as
Sheriff of Cameron County, Texas and
Cameron County, Texas,**

Defendants.

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**CIVIL ACTION NO. B-96-203**

## **PLAINTIFFS' UNOPPOSED MOTION TO AMEND COMPLAINT**

Plaintiffs hereby move to amend their complaint and in support of said motion would respectfully show the following:

1. Plaintiffs have substantially completed their discovery in the above cause and have more clearly identified the policies and practices of the defendants about which plaintiffs complain and have more clearly set out these policies and practices in plaintiffs' first amended original complaint.
2. In addition, additional plaintiffs have filed consents to due in this cause who are reflected in the first amended original complaint.
3. Filing this first amended original complaint will assist in narrowing the issues to be resolved.

**WHEREFORE,** plaintiffs pray that they be granted leave to file their first amended original complaint in the above cause.

Respectfully submitted,

BY: George P. Powell

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**CERTIFICATE OF CONFERENCE UNDER RULE 6**

I, JAMES A. HERRMANN, do hereby certify that on Tuesday, June 2, 1998, I called and spoke to Richard O. Burst, attorney for defendant, and asked if he opposed the filing of Plaintiffs' First Amended Original Complaint and he did not object to this motion.

**CERTIFICATE OF SERVICE**

I, GEORGE P. POWELL, do hereby certify that on this the 1st day of June, 1998, I caused to be mailed a true and correct copy of Plaintiffs' Motion for Leave to File First Amended Original Complaint to defendants' attorney of record:

Mr. Richard O. Burst  
Legal Division Commissioners' Court  
964 E. Harrison St.  
Brownsville, TX 78520

  
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GEORGE P. POWELL